Appendix E

SPCC Plan

EVERETT DELTA LATERAL PROJECT
SPILL PREVENTION, CONTAINMENT AND COUNTERMEASURE PLAN FOR OIL & HAZARDOUS SUBSTANCES

I. Provisions of Plan and Responsibilities of Employees

A. The goal of the plan:

1. To minimize the potential for a spill.
2. In the event of a spill to contain the spillage in the smallest area possible.
3. To protect areas that are of environmental concern.

B. Responsibilities:

It is Northwest's intent that everything practical is done to minimize the potential for and consequences of a spill during the construction of the Everett Delta Lateral Project. Therefore, it is the responsibility of every person associated with the project to be on the lookout for spills or leaks from equipment and take the appropriate action. *Northwest will complete Attachment A (Emergency Contact List) prior to beginning work, provide the attachment to the contractor and inspection personnel and update as required during construction.*

II. Training

The Chief Environmental Inspector (EI) will hold SPCC training prior to the start of any construction for all personnel involved with the project. All personnel added during the course of the project must receive the pre-job SPCC training. No one will be allowed to work on the construction right-of-way without project-specific SPCC training. A second training session will be held for all project personnel just prior to hydrostatic testing of the pipeline to train all those involved on response procedures in case of a hydrostatic test failure. Individual training sessions will also be conducted by the EI for those contractor employees responsible for completing the horizontal directional drills (HDDs). The contractor will be required to maintain a record of those workers that have received training.

III. Hazardous Materials Inventory

Attachment B provides an anticipated inventory of oil, fuel and hazardous substances that will be utilized during construction which, if released, may pose a threat to human health or the environment. In addition, Attachment B provides the reportable quantity (RQ)[1] for each of these materials. Material Safety Data Sheets (MSDS) for each of these chemicals is presented in Attachment B. *Attachment B must be completed by the contractor and MSDSs provided by the contractor prior to beginning work and updated as required during construction.*

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[1] RQs for specific constituents can be found from one or more of the following:
1) 49 CFR 172;
2) 40 CFR Part 302; or
3) MSDS documents.

Any materials brought to the construction right-of-way, yard or temporary extra work areas will be inventoried, reported to the EI and managed in accordance with the guidelines in this plan.

IV. Precautions for Spill Prevention and Control Equipment and Material Locations

A. Spill Prevention and Control:

Hazardous substances, chemicals, fuels and lubricating oils will not be stored within 100 feet of waterbody banks or wetlands or within 200 feet of water supply wells (400 feet of municipal or community water supply wells). Equipment will not be fueled or maintained in wetlands or within 100 feet of waterbody banks or wetlands or within 200 feet of water supply wells (400 feet of municipal or community water supply wells) unless the procedures specified in Section IV. A. 1. e. of this Plan are utilized. Each of the no fueling areas will be clearly identified and their limits staked in the field. To assure that storage and fueling occur in an environmentally acceptable location, the EI must approve the location of all oil, hazardous substance, and chemical storage and fueling areas, other material storage areas and construction equipment maintenance areas prior to their use.

1. Fueling, lubricating or maintaining equipment.

a. Fuels and lubricating oils will not be stored and equipment will not be fueled, lubricated or otherwise maintained in wetlands or within 100 feet of waterbody banks or wetlands or within 200 feet of water supply wells (400 feet of municipal or community water supply wells), unless the procedures specified in Section e. below are utilized. Each of these areas will be clearly identified and their limits staked in the field.

b. All vehicles used to transport lubricants and fuel must be equipped with an emergency spill response kit. At a minimum this kit must include:

- Ten, 48" x 3" oil socks;
- Five, 17" x 17"oil pillows;
- One, 10' x 4" oil boom;
- Twenty, oil absorbent mat pads (Pigalog MAT415 or equivalent);
- Garden size, 6 mil, polyethylene bags;
- Ten pair of liquid proof gloves compatible with materials on-site; and
- One, 55-gallon polyethylene open-head drum.

c. Any fuel or lubricant spilled to the ground during fueling or maintenance of equipment will be cleaned up and properly disposed of immediately.

d. If vehicles/equipment require maintenance on-site, the contractor will install drip pans or other suitable containment devices to collect all fluids. Under no circumstances will the

contractor allow material from the liner to spill on the ground surface. All waste fluids will be removed from the site and disposed of properly.

e. Where site-specific conditions/constraints require equipment (including boring machines) to be refueled in wetlands or within 100 feet of waterbody banks or wetlands or within 200 feet of water supply wells (400 feet of municipal or community water supply wells), the following procedures will be implemented to avoid or minimize potential spills.

1. Where possible, the refueling location will be selected with the best topography to prevent or limit any potential spill from entering a wetland or waterbody.
2. The equipment being refueled will only be filled to ¾ capacity to prevent accidental spills from overtopping.
3. Oil absorbent mat pads or diapers will be placed around the equipment's fuel tank opening to absorb any drips/spills.
4. Drip pans or other suitable containment/liner materials (i.e., plastic sheeting) will also be placed under equipment to ensure that any fuel spills or drips are contained. Under no circumstances will the contractor allow material from the liner to spill on the ground surface. All waste fluids will be removed from the site and disposed of properly.

2. Dewatering pumps, generators and hydrostatic test pumps.

a. Pumps and generators used for dewatering or hydrostatic testing within or in the vicinity (within 100 feet) of waterbodies, wetlands or within 200 feet water supply wells (400 feet of municipal or community water supply wells) will be set in containment structures.

1. Containment structures may be constructed out of strawbales and lined with a minimum of 2 plastic sheets (6 mil plastic) that drape to the ground outside the structure. However, containment structures for small portable pumps/generators may consist of plastic basins such as a child's pool or other similar containers as approved by the EI. The basins shall not be reused if cracked, punctured or contaminated with oil or grease.
2. Fuel for pumps and generators will be carried in by hand and removed immediately after fueling takes place. Under no circumstances will fuel or lubricants be stored within the containment structure.
3. "Heavy Duty" garbage bags for disposal of used materials and a supply of 40 absorbent pads will be kept in the containment structure.
4. When the containment structure is dismantled, the plastic sheeting will be placed in trash bags and immediately hauled away for disposal.

3. Leaks in hoses or fittings on equipment.

   a. The contractor will visually inspect all equipment for leaks and repair all leaks prior to moving the equipment onto the construction right-of-way.
   b. Any leaks that develop while equipment is in use will be repaired immediately. The equipment will not be utilized until repairs are completed.
   c. A minimum of 40 absorbent pads will be kept on all pieces of equipment. When used, they will be properly disposed of and replaced immediately.

4. Hose or fitting (valves, seals, gaskets) failure or rupture.
   Contain spills immediately to reduce spill to the smallest area possible and follow the procedures in this plan.
5. Fuel storage tanks and hazardous materials containers 55-gallons or greater.

   a. All fuel storage tanks/hazardous material containers 55-gallons or greater will be located inside earthen-diked berms designed to hold 1.5 times the capacity of the largest tank/container within the berm. The diked area will incorporate a 12-mil (or thicker) liner in its design. The tank will be set directly on the liner. Non-abrasive padding may be used under the tank to provide stability as long as the integrity of the liner is not compromised. The purpose of this liner is to protect soils located under the tank or used in dike construction from contamination. Any spilled materials located on the liner will be removed immediately and prior to dismantling the tank and dike.
   b. Prior to their use, the contractor will visually inspect each tank for cracks, excessive corrosion, or other flaws which may compromise the integrity of the tank. Hoses and valves will be similarly inspected. If the contractor determines that the equipment is in good mechanical condition, it may be moved onto the right-of-way which includes staging areas and pipe yards. Otherwise, the equipment will be rejected and alternative equipment in good condition employed.
   c. The contractor will inspect the integrity of all dikes and the liner at least daily and repair the dikes or replace the liner immediately if they become breached or torn.
   d. It may be necessary to drain accumulated stormwater from within the diked area containing fuel storage tanks. If the stormwater has been contaminated with fuel or other pollutants, all water will be removed by vacuum truck or similar means and hauled to a disposal facility approved by the State of Washington. However, if no oil sheen is present and there are no other visible signs of pollution, the stormwater may be left to evaporate within the dike after the tank has been removed. Under no circumstances will the contractor allow the

surface discharge or other release of water contained within the diked area without the prior approval of the EI.

B. Material locations:

1. Each work site will have on hand and maintain emergency response equipment. While construction activities are ongoing, all such equipment will be inspected daily for operability and accessibility. The location of fire extinguishers and related emergency response equipment will be clearly marked with signs. Each foreman in charge of construction activities will be provided with and will maintain readily accessible, a copy of this plan.
2. The contractor will designate a single individual who will be responsible for maintenance of all emergency response/spill response materials and equipment.
3. Spill absorbent material and booms of adequate size and number to handle a spill of fuel or other hazardous materials will be stored at a central location(s) readily accessible to each construction crew for immediate response in case of emergency. The location of these stockpiled materials will be at the Utility Vault Yard. If these materials are not stockpiled at the site as required by this plan, construction will not be allowed to commence.
4. At a minimum the following spill control materials will be included in each centrally located spill response kit stockpile:

    - Six bales (200 count each) of absorbent mat pads (Pigalog MAT423 or equivalent);
    - Four boxes of absorbent spaghetti strips (Pigalog PLP402 or equivalent);
    - Four boxes of absorbent pulp (Pigalog SA8010 or equivalent);
    - 300 feet of 5 or 8-inch diameter absorbent skimmer boom material (Pigalog BOM 408 or equivalent);
    - 20 straw bales;
    - 10 packages of garden size, 6 mil, polyethylene bags;
    - Ten pair of liquid proof gloves compatible with materials on site; and
    - One, 55-gallon polyethylene open-head drum.

    Absorbent pads, spaghetti, pulp, and booms will be of the type that is capable of absorbing petroleum products but repels water. (The above list may be modified by the EI in consultation with Northwest's Environmental Representative to better fit the needs of the project).
5. A minimum of 40 absorbent pads will be kept on each piece of equipment. When used, they will be properly disposed of and replaced immediately.
6. The contractor will stockpile bales of straw on or adjacent to the construction right-of-way for the sole purpose of emergency response. After construction is complete, the unused straw may be utilized as mulch in upland areas during reclamation.

7. Contractor foremen and EIs will keep a minimum of one bale (200 count) of absorbent pads in their vehicles.

V. Spill Response: Initial response to an emergency will be to protect human health and safety, and then the environment.

A. Initiate Control, If Safe. Make every effort to stop source of spill and contain spill.

- Shut off equipment;
- Shut off source of spill, if possible;
- Warn all personnel at the construction site, stop all vehicular traffic and work in the area, and remove unnecessary personnel;
- Immediately contact the EI and report observer's name, location, nature and extent of spill;
- Contain the spill to the smallest area possible and stop it from reaching waterways or other sensitive areas (i.e., wetlands, waterbodies, wells, etc.);
- Block spill with backhoe or other equipment as necessary;
- Construct ditch or dike around spill as necessary - earthen dike, strawbales, sand bags;
- Install straw barriers and booms in stream;
- Excavate side pool and isolate spill; and
- Dam stream channel to stop movement of the spill, if necessary.

B. Conduct Initial Assessment (note the following):

- Observers name;
- Any injuries and their extent;
- Location, time and approximate size of spill area;
- Type and approximate amount of material spilled;
- Status of source;
- Did the spill enter a waterbody? Is there a threat to a waterbody; and
- If not contained, direction spill is heading and rate of release.

C. Contact Northwest's Environmental Inspector (EI) Or Chief Inspector

- Provide the information collected above;
- EI or Alternate will be the Emergency Coordinator; and
- The EI will contact and dispatch necessary personnel. If the accident is beyond the capabilities of the equipment and material located on-site to handle, the EI will contact appropriate County emergency assistance (i.e., County HazMat Team) and Northwest's Environmental Representative.

D. EI or Alternate Contact Northwest's Environmental Representative (ER)

- Obtain initial assessment Information;
- Contact County emergency response agency as appropriate;
- Notify appropriate State officials;

- Report any spill that enters any water to the U.S. Coast Guard National Response Center (800) 424-8802;
- Assist contractor and EI in coordinating response and clean-up; and
- Assist contractor and EI to ensure proper dispose of all waste.

E. Northwest's Construction Superintendent

- Provide equipment and manpower as necessary to quickly and safely control and cleanup the spill; and
- Evaluate spill source and determine if procedural changes are necessary to prevent similar future events.

F. Northwest's Environmental Representative

- Evaluate initial assessment information and assist as required in notification of agencies;
- Coordinate and approve disposal of waste materials;
- Conduct cleanup inspection if required; and
- Evaluate spill source and determine if procedural changes are necessary to prevent similar future events

VI. Cleanup and Disposal of Spills

All spilled liquids and contaminated materials will be cleaned up immediately. Cleanup of contaminated materials includes the removal of all soils which have been subjected to the pollutant. If necessary, the EI may require the contractor to collect samples of soil strata below the spill to assure that all contaminated soils have been removed from the site. All materials used to clean-up the spill will be double bagged and inspected prior to removal from the spill site. All vegetation contaminated by the spilled material will be similarly collected, bagged and disposed at an approved disposal facility. All disposals will take place at an appropriately permitted disposal site. Transportation manifests, disposal receipts and weight tickets will be supplied to the EI.

VII. Response to Hydrostatic Test Failure

All available personnel will be put into groups of 2 or 3. The groups will be strategically located along the test section. Each group will have a radio, a minimum of one bale (200 count) of absorbent pads, 200 feet of double absorbent booms, 10 fence posts, 1 post driver, 200 feet of rope, and a knife. Radio communication will be used to alert others of the rupture location. Booms and pads will be used at the site and downstream of the rupture on any waterbody the ruptured water is headed. The EI will take water samples to check for oil and grease residues from the rupture pit and downstream of each set of booms installed. A proper chain of custody form will be completed and samples sent to a local laboratory for analysis.

ATTACHMENT A

Snohomish County Fire Department - 911

Snohomish County Sheriff's Department - 911

Washington Department of Ecology (Northwest Region) - 425-649-7000

Washington Division of Emergency Management – 1-800-258-5990

National 24-Hour Spill Response Center (Coast Guard) - 1-800-424-8802

EMERGENCY SPILL COORDINATOR (ESC), usually the Chief EI

Name: _____ Method of Contact: _____
Alternate Phone #:

AUTHORIZED ALTERNATE (Contact only if you are unable to reach the ESC)

Name: _____Method of Contact: _____
Alternate Phone #:

CONTRACTOR

Name of construction foreman and his/her designated representative, and method of contact. This information to be provided by contractor.

Name: _____Method of Contact: _____
Alternate Phone #:

CONTRACTOR SPILL MATERIAL COORDINATOR

This person is responsible for maintaining all spill control equipment and material. This information to be provided by contractor.

Name: _____Method of Contact: _____
Alternate Phone #:

Northwest's ENVIRONMENTAL REPRESENTATIVE

Name: Dave Beckmeyer
Northwest Pipeline Corporation
(Office) 713-215-2469
(Home) _____
(Cell) 713-306-9708

ATTACHMENT B

HAZARDOUS SUBSTANCE INVENTORY

Material	Quantity (gallons)	Storage Location	Reportable Quantity (include reference)
Oil/Fuel:			
Commercial Chemicals:			
Hazardous Wastes:			

The contractor will designate an individual who will be primarily responsible for maintenance and placement of spill control materials and equipment. This individual will assure that all control equipment is in place and operational prior to the start of construction.